

# **Exhibit "32"**

"FLOW" OF

excellent grammar. His corrections improve the document. Practically all of the written documents the Senior Inspectors produce have plenty of red ink on them after Kelly has reviewed them. He has even required that some of the Senior Inspectors take training in grammar because he wants our documents to be as nearly perfect as possible.

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Q: The Investigator has asked whether I have ever been assigned to Secondary for three consecutive days.

→ 6. Assignments to Secondary are <sup>MADE ON A MASTER SCHEDULE.</sup> ~~directly related to one's caseload.~~ There is a master schedule whereon you can practically count on being assigned to Secondary the day after your day off. I am usually assigned to work Secondary about twice a week. However, I may be called to Secondary on other occasions as well. Because I speak Japanese, I am often called to Secondary when help is needed with a Japanese national. A Senior Immigration Inspector can only do one case at a time and I have been called to Secondary to cover a second case that has come in while the SRI assigned to Secondary dealt with the first case. Sometimes Senior Inspectors are sick, on detail, or involved in other cases. I will sometimes be asked to cover Secondary under those circumstances. <sup>AS THERE ARE ONLY</sup> ~~There are only six of us.~~ <sup>SIX SENIOR INSPECTORS.</sup> ~~The optimum is to have two people work Secondary every day, but I sometimes~~ ~~work Secondary alone.~~

Q: The Investigator has asked whether Kelly has ever changed an affidavit that I have prepared.

→ 7. Kelly proofs and changes every affidavit that we submit to the Assistant U.S. Attorney Office. He makes changes both to format and to content in an effort to

present the facts in the most understandable and persuasive way possible. He does not, however, produce fiction. All of the facts can be corroborated.

8. I have never disagreed with changes Kelly has made to my affidavits. However, I would not hesitate to challenge his changes if I disagreed with them. Kelly is flexible. He is not a tyrant *AND IS OPEN TO CHALLENGES TO HIS DECISIONS.*

Q: The Investigator has asked me whether I have a phone on my desk. *lun*

9. I share a phone and a cubicle with Richard Westlake. The phone is on a bookshelf within arm's reach. I am not too inconvenienced by this arrangement because I am not on the phone all day. The nearest phone to Andrew Lopez is about eight feet away. This probably is a little inconvenient for him but he, like I,

*ALTHOUGH I CAN'EMPA THIS WITH ANDREW'S COMPLAINT ON THIS MATTER. lun*

Q: The Investigator has asked me whether I have received or felt a need for training on the Asian Organized Crime database.

10. We received on the job training. If a person needs help with the Asian Organized

Crime database, they simply have to ask someone to help them. *THIS IS NOT A TOPIC THAT WOULD WARRANT FORMAL TRAINING. lun*

Q: The Investigator has asked me about Andrew's participation in the Carrier Consultant Training that I have provided to the airlines.

11. The Carrier Consultant training that we have offered in Honolulu is a courtesy training to the airlines designed to help them identify fraudulent documents. It is not as extensive as the formal training that INS provides through the Carrier Consultant Program in Washington, D.C.

12. I received formal Carrier Consultant training in Washington, D.C. Richard Westlake, who has also been involved in providing the training, was not trained at

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